

To Whom It May Concern:

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My name is Paul Zolezzi, and I am the Timberland Manager for the Rocking C Ranch, LLC (RCR). RCR is a family owned non-industrial private timber company with holdings in Lane and Douglas counties, Oregon. I am writing to comment on the EIS regarding the BLM's noxious weed program and the five associated alternatives.

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As a third generation owned company with extensive experience managing close to 8500 acres of forestland, RCR has a thorough understanding of vegetation management principles and procedures in this particular region of Western Oregon. Over the past 45 years, we have used chemical, manual, mechanical, biological, and fire control methods to combat noxious weeds. Our experience has shown us that the use of chemicals is an invaluable tool in our program to combat noxious weeds on our forestland.

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Much of RCR's timberland adjoins BLM lands due to the checkerboard nature of BLM ownership in both Lane and Douglas counties. Thus, we share many of the same roads via reciprocal/perpetual right-of-way (ROW) agreements. Unfortunately, we also share many of the same noxious weeds. We strongly believe that the restricted use of herbicides on BLM units and ROW's, adversely affects our timberland operations. BLM units that aren't appropriately controlled for noxious weeds invariably blow seed into nearby RCR units. This results in more aggressive measures on our part to combat these noxious weeds that infiltrate our units. This costs RCR more money in the long run to manage our forests. Furthermore, the road systems in and out of RCR forestland are extensive, complex, and rely heavily on BLM's road maintenance program. When the BLM doesn't manage their infrastructure via effective roadside spray programs, it makes it very difficult for RCR to effectively access and manage our properties. It is for these reasons that we support Alternative B, and look forward to its adoption and implementation.

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In conclusion, RCR strongly urges the BLM to adopt Alternative B, which will expand herbicide use and allow for the use of new herbicides in seventeen western states. We feel that this alternative is the best one of the five available, and will lead to more responsible management of public lands, which in turn will benefit not only RCR, but the public as a whole. A noxious weed management program that uses safe, legal chemicals and abides by both state and federal laws, is an invaluable tool in managing healthy, productive forestland in Western Oregon.

Thank you for the opportunity to comment on this issue.

Regards,

Paul Zolezzi
Timberland Manager
Rocking C Ranch, LLC